



KEYSTONE CEMENT COMPANY

P.O. BOX A, BATH, PA 18014-0058 TELEPHONE: (610) 837-1881

232045 10/9/14



July 30, 2014

Mr. Mark J. Wejkszner, P.E.
Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
2 Public Square
Wilkes-Barre, PA 18711-0790

AIR QUALITY

Ms. Diana Escher, Director
Air Protection Division
USEPA, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

AUG 01 2014

FACILITY: _____
PERMIT #: _____
COUNTY: _____
FILE CODE: _____

Re: *Submittal of §63.10(d)(5)
Periodic Startup, Shutdown, and Malfunction Report
For Units Subject to 40 CFR 63 Subpart LLL
For the period of January 01, 2014 through June 30, 2014
Keystone Cement Company, Bath, Pennsylvania*

Dear Mr. Wejkszner and Ms. Escher:

Keystone Cement Company Bath, PA facility (Keystone) is submitting the enclosed periodic startup, shutdown, and malfunction (SSM) report for emission units subject to the requirements of 40 CFR 63 Subpart LLL – National Emissions Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry. Keystone is submitting this report for the semi-annual period from January 01, 2014 through June 30, 2014 in accordance with the requirements of 40 CFR §63.10(d)(5)(i). Pursuant to these requirements, a periodic SSM report is only required if a startup, shutdown, or malfunction (SSM event) caused the affected source to exceed the emission standards in §63.1344(a).

Keystone experienced SSM events for the units subject to emission standards in §63.1344(a) during the reporting period and is submitting this periodic SSM report in accordance with the requirements of §63.10(d)(5)(i).

If a periodic SSM report is required, the regulation specifies that the following information must be included:

- If actions taken by an owner or operator during a startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan (SSM Plan), the owner or operator must state such information in a startup,

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shutdown, and malfunction report. If actions taken by the owner or operator during SSM events were consistent with the procedures specified in the source's SSM Plan the owner or operator must state such in the periodic SSM report.

For each SSM event that occurred during the reporting period Keystone followed the procedures specified in the facility's SSM Plan.

- The number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused an emission limit to be exceeded must be included.

A summary table of the malfunction that occurred during the reporting period where excess emissions may have resulted is attached. As previously stated, Keystone followed the procedures specified in the SSM Plan for all of the malfunction events.

Records of all startup and shutdown events, as well as malfunction events that caused excess emissions are maintained on-site as part of the facility operating record and are available for inspection. If you have any questions or require any addition information regarding this submittal please contact Jeffery W. Smith, P.E. at (610) 837-1881 ext. 3213 or at Jeffery.Smith@gcpv.com.

By signing this letter, I certify that I am a responsible official as that term as defined 40 CFR §63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,



Jose de la Vega
Plant Manager

Enclosures

cc: Jeffery W. Smith, P.E., Keystone



7/30/14

ATTACHMENT A -
PERIODIC SSM REPORT

AIR QUALITY

AUG 01 2014

FACILITY: _____
PERMIT #: _____
COUNTY: _____
FILE CODE: _____

PERIODIC SSM REPORT

Reporting Period: January 01, 2014 through June 30, 2014

Contact Person: Jeffery W. Smith, P.E.
 Manager, Environmental Compliance
 Keystone Cement Company
 Route 329
 P.O. Box A
 Bath, PA 18014-0058
 Phone: (610) 837-1881 ext. 3213

Actions taken during this reporting period in response to excess emission events caused by a malfunction were consistent with the SSM Plan. These events are listed below in Table 1.

TABLE 1 - STARTUP, SHUTDOWN, AND MALFUNCTIONS WHERE SSM PLAN WAS FOLLOWED

Date	Subject Unit	Parameter	Description	Duration (min)	Corrective Action
2/5/2014	Kiln Feed System & Kiln Feed Transfer System	Visible Emissions	Frozen components (i.e., air lines and ductwork), and a plugged discharge pipe resulted in visible emissions.	Duration not confirmed ¹	Kiln feed was stopped. Repairs were completed and equipment was returned to service. Review of SSM Plan and training of Production Department supervisory staff.
5/19/2014	Raw Material System Conveyors & Elevators	Visible Emissions	Process upset/malfunction caused failure of primary ID fan for the Raw Mill. The condition created positive draft conditions within the system, resulting in visible emissions from the equipment.	1	Equipment was reset and the primary ID fan was restarted; emissions ceased.
5/24/2014	Clinker Cooler	Opacity	Draft was maintained on clinker cooler during kiln shutdown and removal of material buildup within the preheater and kiln. Removal of the material resulted in excess opacity from the clinker cooler.	23	Continued work on cleanout of the kiln as "normal". APC was operated during material removal to minimize the potential excess emissions.
5/29/2014	Clinker Cooler	Opacity/ Visible Emissions	Draft was maintained on clinker cooler during kiln shutdown and removal of material buildup within the preheater and kiln. Removal of the material resulted in a "push" and excess opacity from the clinker cooler.	54	System shutdown and maintenance completed; returned to normal operating conditions upon restart of the kiln.

¹ Keystone submitted written notification of this event to Mr. Andrew Schweitzer of PA Department of Environmental Protection on February 14, 2014, which included a detailed description of the event and associated time period.

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